

Plaintiffs Fund Texas Choice, The North
Texas Equal Access Fund, The Lilith Fund
for Reproductive Equity, Frontera Fund,
The Afiya Center, West Fund, Jane’s Due
Process, Clinic Access Support Network, and
Dr. Ghazaleh Moayed, DO, MPH, FACOG,

Plaintiffs,

vs.

KEN PAXTON, in his Official Capacity as
Attorney General; et al.,

Defendants.

[illegible]

3. Plaintiff Dr. Ghazaleh Moayedi, DO, MPH, FACOG is scheduled to deliver a series of lectures in San Francisco, CA on September 26 and 27, 2022. Dr. Moayedi has ceased providing abortion-related medical services in Texas because of Texas' newly implemented abortion bans,

and her medical practice's income has suffered consequently. Thus, Dr. Moayedí needs to fulfill her obligations as a paid lecturer to support her family financially. Dr. Moayedí will be available on September 27, except between 11am and 12:30pm CST and after 6:30pm CST, to appear for the hearing and testify if needed.

4. Pursuant to Rule 43(a) and (c), if Ms. Rupani and/or Dr. Moayedí need to testify in the hearing, they have shown above (Paragraphs 2 and 3) good cause in compelling circumstances to do so by contemporaneous transmission from a different location. FED.R.CIV.P. 43(a),(c).

WHEREFORE, Plaintiffs respectfully move this Court to allow Anna Rupani (on behalf of Plaintiff Texas Fund Choice) and Plaintiff Dr. Ghazaleh Moayedí, DO, MPH, FACOG to appear and testify (if the Court deems appropriate) via virtual/remote means at the September 27, 2022 Preliminary Injunction Hearing.

Dated: September 15, 2022

Respectfully submitted,

s/ Jennifer R. Ecklund

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CERTIFICATE OF CONFERENCE

I conferred by email on September 14 and again on September 15, 2022 with the DA Defendants and County Attorney Defendants, and they do not oppose the relief sought herein. I twice emailed counsel for Defendant Attorney General regarding this motion but received no response, and therefore assume he opposes.

s/ Elizabeth G. Myers

Elizabeth G. Myers

CERTIFICATE OF SERVICE

I hereby certify that on September 15, 2022, a copy of the foregoing was filed electronically with the Clerk of Court using the CM/ECF system.

s/ Jennifer R. Ecklund

Jennifer R. Ecklund